

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA, :
: Plaintiff, : CASE NO. 2:22-MJ-366
v. :
: MAGISTRATE JUDGE DEAVERS
SHIHAB AHMED SHIHAB SHIHAB, :
: Defendant. :
:

**JOINT MOTION FOR THIRD EXTENSION OF TIME DURING WHICH
INDICTMENT/INFORMATION MUST BE FILED**

Now come the parties, through their undersigned attorneys, and jointly move this Court for an order extending the time for the return of an Indictment or Information pursuant to 18 U.S.C. § 3161(b), from October 21, 2022, until December 16, 2022. Mr. Shihab is aware of his right to the timely filing of an Indictment or Information, afforded to him under 18 U.S.C. § 3161(b), and hereby waives that right for the purposes of this motion. Defense counsel has communicated with his client and certifies that this waiver is knowingly and voluntarily made. The Parties believe this continuance would best serve the interests of justice and that the time would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

Given the nature of the instant case, the voluminous discovery being provided on a rolling basis and need for an interpreter, and the desire to explore the possibility of a pre-indictment resolution, the Parties are requesting additional time before an Indictment or Information must be filed. The Parties have met and continue to communicate about the facts of the case, discovery, and plea negotiations. As always, the Parties have exercised and will continue to exercise due diligence in reviewing discovery and reaching a prompt resolution of this matter.

For these reasons stated herein, the United States and Defendant's counsel request an extension of the time within which an Indictment or Information may be filed in this case until December 16, 2022. George Chaney, attorney for Shihab Ahmed Shihab Shihab, has indicated that he agrees to the requested extension of the time.

Respectfully submitted,

KENNETH L. PARKER
United States Attorney

s/Jessica W. Knight
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Unopposed Motion for Extension of Time During Which Indictment/Information Must be Filed was served on October 18, 2022, electronically on all parties of record.

s/Jessica W. Knight
JESSICA W. KNIGHT (0086615)
Assistant United States Attorney